## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

TIMOTHY MARSH

Plaintiff

Civil Action No. 1:18-cv-00787-LO-IDD v.

GERALD CURRAN, ESQUIRE, ET. AL

Defendants

## **OBJECTIONS TO SUBPOENA**

COMES NOW, Deponent, Mark R. Dycio, by and through undersigned counsel, and notes the following objections to Plaintiff's subpoena duces tecum:

- An objection to Topic No. 1 is noted as it seeks to invade the attorney-client 1. and/or work product privileges.
- 2. An objection to Topic No. 2 is noted as it seeks to invade the attorney-client and/or work product privileges.
- 3. An objection to Topic No. 3 is noted as it seeks to invade the attorney-client and/or work product privileges.
- 4. An objection to Topic No. 4 is noted as it seeks to invade the attorney-client and/or work product privileges.
- 5. An objection to Topic No. 5 is noted as it seeks to invade the attorney-client and/or work product privileges.
- 6. An objection to Topic No. 6 is noted as it seeks to invade the attorney-client and/or work product privileges.
- 7. An objection to Topic No. 7 is noted as it seeks to invade the attorney-client and/or work product privileges.

- 8. An objection to Topic No. 8 is noted as it seeks to invade the attorney-client and/or work product privileges.
- 9. An objection to Topic No. 9 is noted as it seeks to invade the attorney-client and/or work product privileges.
- 10. An objection to Topic No. 10 is noted as it seeks to invade the attorney-client and/or work product privileges.
- 11. An objection to Topic No. 11 is noted as it seeks to invade the attorney-client and/or work product privileges.
- 12. An objection to Topic No. 12 is noted as it seeks to invade the attorney-client and/or work product privileges.
- 13. An objection to Topic No. 13 is noted as it seeks to invade the attorney-client and/or work product privileges.
- 14. An objection to Topic No. 14 is noted as it seeks to invade the attorney-client and/or work product privileges.
- 15. An objection to Topic No. 15 is noted as it seeks to invade the attorney-client and/or work product privileges.
- 16. An objection to Topic No. 16 is noted as it seeks to invade the attorney-client and/or work product privileges.
- 17. An objection to Topic No. 17 is noted as it seeks to invade the attorney-client and/or work product privileges. Furthermore, such Topic is vague and ambiguous.
- 18. An objection to Topic No. 18 is noted as it seeks to invade the attorney-client and/or work product privileges. Furthermore, such Topic is vague and ambiguous.

19. An objection to Topic No. 19 is noted as it seeks to invade the attorney-client and/or work product privileges. Furthermore, such Topic is vague and ambiguous.

Respectfully submitted,

MARK R. DYCIO

By counsel,

DeCARO, DORAN, SICILIANO, GALLAGHER & DeBLASIS, LLP

/S/ James S. Liskow

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this <u>2nd</u> day of <u>August</u>, 2019, a copy of the foregoing was electronically filed to:

Jon D. Pels, Esquire Kerry Edwards, Esquire Alvaro Llosa, Esquire 8500 Leesburg Pike, Suite 400 Vienna, VA 22010

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/s/ James S. Liskow
James S. Liskow

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